



Bruderly for Congress

6th CONGRESSIONAL DISTRICT - FLORIDA
920 SW 57th Dr.
Gainesville, FL 32607
Campaign Phone Number (352) 377-0932
www.bruderly.com

November 10, 2006

Jeff S. Jordan, Supervisory Attorney
Complaints Examination & Legal Administration
General Counsel's Office
Federal Election Commission
999 E Street NW
Washington, DC 20463-0002

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COMMISSION
OFFICE OF GENERAL
COUNSEL

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Re: MUR 5861
Bruderly for Congress
Identification Number: C00381210

Dear Mr. Jordan:

I have received your letter of October 30, 2006 and the enclosed copy of a complaint regarding certain FEC reports filed by me. Following are my responses to Items (1) through (4) of the complaint.

1. On amended report for 11/23-12/31/04; and
2. On amended report for 1/1-3/31/05:

In accordance with FEC requirements, Line 17 reported all operating expenditures for the period, and the itemized disbursement page reported only disbursements required to be itemized. The attached lists, which were not required to be included in the above reports, show all items that make up the totals on Line 17 of both reports.

3. The discrepancy in cash balances questioned in the FEC's letter dated 6/28/05 was corrected in the amended reports referred to in (1) and (2) above. As requested, the value of exempt accounting services regarding the 2004 election was deleted from receipt and disbursement totals in the amended report referred to in (2) above; however, a memo entry for the value of those services appears to have been inadvertently omitted from Schedule A.



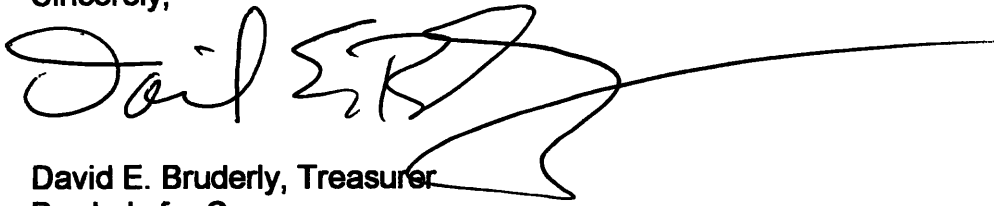
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4. Complainant's Exhibit (3), purporting to be a correction of cash-on-hand figures in my reports, is incorrect due to initial errors in arithmetic, which complainant then carries forward. Lines 2 and 3 of the exhibit's COH column reverse the calculations made in the two reports referred to in (1) and (2) above by, in each case, subtracting Line 26 from Line 25 as if Line 26 were a positive figure, when in fact Line 26 is a negative figure. When the negative disbursement figure reported on Line 26 is subtracted from the subtotal of cash on hand and total receipts (Line 25), the result in cash on hand on Line 27 is an addition to the subtotal, not a deduction. (The short explanation is that, in arithmetic, a double negative results in a positive.)

Therefore, the cash-on-hand figures in the Bruderly column of complainant's Exhibit (3), and in my reports, are correct, and the figures in the COH column, with the exception of the first one, are incorrect.

I did not find it appropriate to retain counsel regarding this complaint or to sign this letter under oath. I trust you will concur and that you will find that no action should be taken against Bruderly for Congress and me, as treasurer, in this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "David E. Bruderly", followed by a long horizontal line extending to the right.

David E. Bruderly, Treasurer
Bruderly for Congress

Operating Expenses
2004 Year-End (11/23-12/31)

Name	Date	Amount	Purpose
Bank of America	11/30/2004	\$67.53	Bank service charges
Bank of America	12/31/2004	\$96.79	Bank service charges
Voz Latina	12/09/2004	<u>-\$324.00</u>	Convert lost check to debt
	Total	-\$159.68	

Operating Expenses
2005 First Quarter (1/1-3/31)

Name	Date	Amount	Purpose
Bank of America	01/12/2005	\$ 30.00	Bank service charges
Comcast Spotlight	03/26/2005	-\$136.00	Refund of advertising expenses
Cox Media	02/03/2005	-\$ 60.00	Refund of paid advertising
	Total	-\$166.00	

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